

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
Civil Action No. 3:22-cv-630-MOC-DSC

SARA BETH WILLIAMS, BRUCE)
KANE, JASON YEPKO, GUN)
OWNERS OF AMERICA, INC.,)
GUN OWNERS FOUNDATION,)
GRASS ROOTS NORTH)
CAROLINA, and RIGHTS WATCH)
INTERNATIONAL,)

Plaintiffs,)

v.)

SHERIFF GARRY MCFADDEN, in)
his official capacity as Sheriff of)
Mecklenburg County, and the)
MECKLENBURG COUNTY)
SHERIFF'S OFFICE)

Defendants.)

**MOTION FOR EXTENSION OF
TIME**

Defendants respectfully move this Court to extend the time in which to file a response to Plaintiffs' motion for preliminary injunction from December 27, 2022 to January 10, 2023. In support of this motion, Defendants state as follows:

1. Plaintiffs filed their complaint in this Court on November 28, 2022. [Document 1].

2. Defendants waived service and their response to the Complaint is due February 6, 2023.

3. On December 12, 2022, Plaintiffs filed a motion for preliminary injunction. [Document 9]. The response to Plaintiffs' motion is December 27, 2022.

4. The undersigned respectfully requests a two week extension for filing a response to this Motion due to the undersigned's personal commitments during the holiday season, as well as his professional commitments. The undersigned counsel has ten motions for summary judgment due on December 22, 2022, in *McMahan v. Griffin*, 22-28-cv- 37, in this Court, as well as a state court mediation on Thursday December 22, 2022.

5. Defendants are not filing this motion for the purpose of delay, but rather to allow time for review of the file in this case in order to prepare a well-written response to Plaintiff's motion.

6. Defendants have consulted with counsel for Plaintiffs and they consent to this request.

WHEREFORE, Defendants request a two week extension of time to file a response to Plaintiffs' motion for preliminary injunction through and including January 10, 2023.

Respectfully submitted this 20th day of December, 2022.

/s/Sean F. Perrin

Sean F. Perrin

N.C. State Bar No. 22253

Alexander J. Buckley

N.C. State Bar No. 53403

WOMBLE BOND DICKINSON (US) LLP

301 South College Street, Suite 3500

Charlotte, North Carolina 28202-6037

Telephone: 704-331-4992

Facsimile: 704-338-7814

Sean.Perrin@wbd-us.com

Alex.Buckley@wbd-us.com

/s/J. George Guise

J. George Guise

N.C. State Bar No. 22090

Mecklenburg County Sheriff's Office

801 East Fourth St.

Charlotte, North Carolina 28202

*Attorneys for Defendants Sheriff Garry
McFadden and Mecklenburg County Sheriff's
Office*